IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

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|---|---|
| IN RE:<br><br>MADELINE MORAN SANTIAGO<br><br>DEBTOR | CASE NO. 13-04205/ESL<br><br>CHAPTER 13 |

**DEBTOR'S REPLY TO FIRSTBANK PUERTO RICO MOTION TO DISMISS, DOCKET #85**

**TO THE HONORABLE COURT:**

**COMES NOW, MADELINE MORAN SANTIAGO**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On October 31, 2016, First Bank Puerto Rico ("First Bank") filed a motion to dismiss, docket #85, stating that the debtor has failed to comply with Plan payments under the terms of the confirmed Plan, owing three (3) payments for a total sum of $1,650.00.

2. The debtor met with the undersigned attorney regarding this matter and respectfully submits that she did incur in the Plan arrears due to certain economic problems.

3. The debtor hereby respectfully submits that she made one (1) $550.00 payment, registered with the Trustee on October 26, 2016, and on November 19, 2016, she made two (2) $550.00 payments, for a total sum of $1,650.00, curing all the arrears in her Plan payments. Attached is copy of the *Trustee's Financial Summary* and payments made on November 19, 2016 as evidence of the payments made to the Trustee.

**WHEREFORE**, debtor respectfully requests this Honorable Court deny the motion to dismiss, docket #85, filed by First Bank.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee, Alejandro Oliveras Riveras, Esq.; Maria M. Benabe Rivera, Esq.; Counsel for First Bank; I also certify that a copy of this motion was sent via US Mail to the debtor, Madeline Moran Santiago to the address of record: PO Box 047, San Lorenzo, PR 00754.

**RESPECTFULLY SUBMITTED**. In San Juan, Puerto Rico, this 23rd day of November 2016.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726-0186
TEL 787-744-7699 FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

Bradulio Duran
13-04205

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# CUSTOMER'S RECEIPT

SEE BACK OF THIS RECEIPT FOR IMPORTANT CLAIM INFORMATION

NOT NEGOTIABLE

Pay to: Alejandro Oliveras Rivera

Address: Chapter 13 Trustee office
PO Box 71486 San Juan, PR 00936-8586

KEEP THIS RECEIPT FOR YOUR RECORDS

Serial Number 24207000603

Year, Month, Day 2016-11-19 Post Office 000754 Amount $550.00 Clerk 01

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# CUSTOMER'S RECEIPT

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# FINANCIAL SUMMARY - CASE 13-04205

MADELINE MORAN SANTIAGO paying **$550.00** MONTHLY

Receipts | Rcpts/Deb Refunds | Disbursements | Adjustments | Trustee Disb | Trustee Adj | Show All

Limits: Select Start Date Select Claim ID Select Payee Name Check Status: Cleared Stale Dated Stop Payment Cancelled Voided Outstanding

| Date | Payee | Payee Name | Source / Check | Description | Receipts | Disbursements | Balance |
|---|---|---|---|---|---|---|---|
| 10/26/2016 | | | 0714 86704 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 8/23/2016 | | | 0714 86706 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 8/23/2016 | | | 0714 86705 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 7/22/2016 | | | 0714 86704 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 5/24/2016 | | | 0714 86701 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 5/24/2016 | | | 0714 86701 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 4/19/2016 | | | 0714 86703 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 3/22/2016 | | | 0714 86700 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 1/21/2016 | | | 0714 86702 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 1/21/2016 | | | 0714 86702 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 11/30/2015 | | | 0714 86701 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 11/4/2015 | | | 0714 86700 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 9/29/2015 | | | 0714 86705 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 8/26/2015 | | | 0714 86702 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 7/21/2015 | | | 0714 86700 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 6/24/2015 | | | 0714 86703 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 5/19/2015 | | | 0714 86700 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 4/22/2015 | | | 0714 86302 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 3/17/2015 | | | 0714 86305 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 1/28/2015 | | | 0714 86304 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 12/31/2014 | | | 0714 86702 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 12/2/2014 | | | 0714 86302 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 10/28/2014 | | | 0714 86702 0003 | LOCKBOX PAYMENT | $550.00 | | |
| 9/23/2014 | | | 0600 00007 7011 | LOCKBOX PAYMENT | $550.00 | | |
| 9/16/2014 | | | 0601 00004 5122 | LOCKBOX PAYMENT | $550.00 | | |
| 8/19/2014 | | | 0600 00002 8245 | LOCKBOX PAYMENT | $550.00 | | |
| 8/19/2014 | | | 0600 00001 8223 | LOCKBOX PAYMENT | $550.00 | | |
| 6/25/2014 | | | 0656 00301 8621 | LOCKBOX PAYMENT | $550.00 | | |
| 4/25/2014 | | | 0600 00041 4900 | LOCKBOX PAYMENT | $550.00 | | |
| 4/23/2014 | | | 0600 00101 6097 | LOCKBOX PAYMENT | $550.00 | | |
| 3/25/2014 | | | 0600 00141 2034 | LOCKBOX PAYMENT | $550.00 | | |
| 2/25/2014 | | | 0601 00081 1788 | LOCKBOX PAYMENT | $550.00 | | |
| 1/23/2014 | | | 0600 00161 0792 | LOCKBOX PAYMENT | $550.00 | | |
| 1/23/2014 | | | 0600 00121 0781 | LOCKBOX PAYMENT | $550.00 | | |
| 11/20/2013 | | | 0501 00410 9286 | LOCKBOX PAYMENT | $550.00 | | |
| 11/20/2013 | | | 0501 00400 9286 | LOCKBOX PAYMENT | $550.00 | | |
| 9/24/2013 | | | 0600 00041 7491 | LOCKBOX PAYMENT | $550.00 | | |
| 8/29/2013 | | | 208 8 -29 2013 | OFFICE DIRECT DEPOSIT | $550.00 | | |
| 7/5/2013 | | | 208 7 -5 2013 | OFFICE DIRECT DEPOSIT | $550.00 | | |
| | | | | **Totals:** | **$21,450.00** | **$0.00** | |